

Remarks/Arguments

A. Claims in the Case

Claims 1-7, 9-11, 13-19, 21-30, 32-34, 36-42, 44-57, 59-61, 63-69, 71-73, and 147-152 are pending. Claims 1, 2, 4, 9, 10, 17-19, 24, 25, 27, 32, 33, 40-42, 51-57, 59-61, 63-69, 71-73, and 149 have been amended.

B. Claim Objections

The Examiner objected to claims 2, 17, 19, 40, 42, 67, 69, and 147. Claim 2 has been amended for clarification to recite “from Financial Services Organization (FSO) transaction-related data in the FSO computer system”. Claims 17, 19, 40, 42, 67, 69, and 147 have been amended for clarification to recite “relationship object representations”.

C. 35 U.S.C. § 112, First Paragraph

The Examiner rejected claims 1, 24, and 51 under 35 U.S.C. §112, first paragraph. The Examiner states: “There are steps missing that are considered to be critical or essential to the practice of the invention, but not included in the claim(s) is not enabled by the disclosure.” Applicant respectfully disagrees with these rejections. Nevertheless, to expedite prosecution of the present application, Applicant has amended claims 1, 24, and 51 to describe “processing at least one of the plurality of lower level processing relationship objects, one of the lower level processing relationship objects representing a credit card issuer, or an acquirer; processing each of the relationship definitions.” Applicant requests removal of the rejections of claims 1, 24, and 51.

D. 35 U.S.C. § 112, Second Paragraph

The Examiner rejected claims 18, 19, 42, and 69 under 35 U.S.C. §112, second paragraph. Claim 18 has been amended to recite: “identifying one or more values and one or more properties”. Claim 19, 42, and 69 have been amended to delete the phrase “one or more methods and”. Applicant requests removal of the rejections of claims 18, 19, 42, and 69.

E. The Claims Are Not Obvious In View of Pinard in view of Bierenbaum Under 35 U.S.C. §103(a)

The Examiner rejected claims 1-7, 9-11, 13-19, 21-30, 32-34, 36-42, 44-57, 59-61, 63-69, 71-73 and 147-152 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,075851 to Pinard et al. (“Pinard”) in view of U.S. Patent No. 6,970,844 to Bierenbaum (“Bierenbaum”). Applicant respectfully disagrees with these rejections.

To reject a claim as obvious, the Examiner has the burden of establishing a *prima facie* case of obviousness. *In re Warner*, 154 U.S.P.Q. 173, 177-78 (C.C.P.A. 1967). To establish *prima facie* obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974); MPEP § 2143.03. In addition, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991).

Claims 1, 24, and 51 have been amended to describe combinations of features including, but not limited to:

creating a highest level processing relationship object in a processing

relationship structure, wherein the highest level processing relationship object represents an FSO;
creating a plurality of lower level processing relationship objects in the processing relationship structure, wherein the plurality of lower level processing relationship objects in the processing relationship structure are descendants of the highest level processing relationship object;
processing at least one of the plurality of lower level processing relationship objects, one of the lower level processing relationship objects representing a bank branch office, a regional bank, a credit card issuer, or an acquirer

The combination of Pinard and Bierenbaum does not appear to teach or suggest at least the above-quoted features of claims 1, 24, and 51, in combination with the other features of the claims.

Applicant's claims are directed to a method that includes preparing a processing relationship definition for selected processing relationship object representations. Each of the processing relationship object representations correspond to part of a financial services organization. For example, Applicant's specification states:

A Financial Service Organization (FSO) is a business organization that provides financial products and/or services to customers and/or client organizations. An FSO may include one or more organizational units. Examples of organizational units include, but are not limited to, an entity, a business unit, a subsidiary, a division, a functional unit, a headquarters, an operating unit, a profit center, a regional office, and a branch office.

Figure 2a illustrates an example of an FSO business organization according to one embodiment. For example, the FSO business organization may be a global bank 2250. The FSO business units may be represented in a chart or a similar graphical form to illustrate the attributes of an FSO organization such as, but not limited to, the reporting relationship between various FSO entities, the reporting structure, the number of hierarchical levels between the highest level entity and the lowest level entity, and the number of direct reports for an FSO entity. Each FSO entity may be represented as a node or a block on an FSO organizational chart. For example, global bank is represented as node 2250, the business unit for Americas by node 2252, the business unit for Europe, Middle

East and Africa by node 2254. Each node may have a parent node and one or more children nodes. For example, USA business unit 2256 has a parent node Americas 2252 and has two children nodes, region AUE 2260 and region AUW 2258. Each node may be identified uniquely with a node number and/or a name. The FSO organizational chart may include multiple levels 2266 in the hierarchical relationship. A node without a parent may be described as a root node or a level zero node. A root node may include the entire FSO organization. The global bank node 2250 may be described as a root node. The FSO organizational chart may be updated, in real-time, as new FSO entities are introduced or removed by adding or deleting a node corresponding to the FSO entity. The FSO organizational chart may thus graphically represent the current, real-world state of the FSO organization.

In one embodiment, an FSO user may create a similar or identical processing relationship structure modeled after the FSO business organization. In one embodiment, an FSO user may use a processing relationship configuration software program to configure or define the processing relationships between various FSO entities which represent the FSO business organization. In one embodiment, an FSO user may configure a node in the processing relationship structure to provide the same or similar functionality provided by the real-world FSO entity. In one embodiment, there may be a one-to-one correspondence between a node included in the FSO business organization chart and a node included in the processing relationship structure.

In one embodiment, the processing relationship structure 2276 may be based on object-oriented technology. Each node in the processing relationship structure 2276 may be represented by a software object which may be defined by the methods and properties associated with the object. For example, in one embodiment, a node may be represented by a bank object. The bank object may include properties such as, but not limited to, bank locations, ATM locations, types of customer accounts, types of loans. The bank object may include methods such as, but not limited to, add_new_account, add_new_location, delete_current_loan. In one embodiment, an FSO user may create various classes of objects such as a class of bank objects. A user may create an instance of the class to create, for example, a new global bank. The new global bank object may inherit all of the properties and methods associated with the class of bank objects.

Applicant's claims are directed to creating a plurality of software objects that represent a bank branch office, a regional bank, a credit card issuer, or an acquirer of a financial service

organization, along with a highest level object which represents the financial service organization. Applicant submits that none of the cited references teach or suggest creating and/or using software objects to create such a model of a financial service organization.

With respect to the feature “creating a highest level processing relationship object in a processing structure, wherein the highest level processing relationship object represents an FSO”, the Examiner relies on col. 3, lines 4-8 and Fig. 3 of Pinard. The cited portion of Pinard states:

The database should also store the telephone directory number of each of the persons in the organization chart, as shown in FIG. 3. Records are shown in the directory which correlates names in a first column and extension (directory) numbers in a second.

Pinard discloses a database having the telephone directory number of each person in an organizational chart. The names in a first column of the directory are correlated with numbers in a second column of the directory. The Examiner acknowledges that Pinard does not expressly disclose a Financial Service Organization (FSO) computer system. The Examiner states that Bierenbaum discloses a Financial Service Organization (FSO) computer system. Applicant submits, however, that the cited portion of Pinard and Bierenbaum, whether taken separately or in combination, do not teach or suggest creating a highest level processing relationship object in a processing structure, the highest level object representing a Financial Service Organization.

Amended claims 1, 24, and 51 further describe:

processing at least one of the plurality of lower level processing relationship objects, one of the lower level processing relationship objects representing a bank branch office, a regional bank, a credit card issuer, or an acquirer

Pinard states:

The database contains an organizational chart 15 as shown in FIG. 2, which contains definitions of roles and associates them with names of individuals. What

is meant by definitions of roles is relationships of reporting structures, identification of groups, etc. For example, in FIG. 2, both Helen and Joe are shown reporting to Bill, Fred reports to Joe, Jane is Fred's secretary, and the group comprising John, Mary and David report to Fred.

(Pinard, col. 2, lines 57-65)

Pinard discloses a database containing an organizational chart with definitions of employee roles and reporting structure, such as "Fred reports to Joe". Pinard, taken separately or in combination with the other cited art, does not appear to disclose processing lower level processing relationship objects representing a bank branch office, a regional bank, a credit card issuer, or an acquirer.

Applicant submits that, for at least the reasons discussed above, claims 1, 24, and 51, and the claims depending thereon, are patentable over the cited art. Applicant therefore respectfully requests removal of the 35 U.S.C. §103(a) rejections of these claims.

Applicant submits that many of claims dependent on claims 1, 24, and 51 are independently patentable. For example, amended claim 4 recites: "wherein the processing relationship value is configured for use in identifying an FSO business entity as an owner of the FSO transaction-related data, wherein the FSO business entity is a bank branch office or a regional bank or a credit card line or an issuer or an acquirer". The cited art does not appear to teach or suggest at least these features of claim 4, in combination with the other features of the claim.

The Examiner states:

As per claims 4, 27, 54, 147, and 150, Pinard discloses, wherein the FSO business entity is a company or a business unit or a bank branch office or a regional bank or a credit card line or an issuer or an acquirer. In Fig. 2 of Pinard shows a business entity as a company and a business unit (see col. 2, lin 62- col.. 3, line 3 and lines 27-32)

The cited portions of Pinard state:

The database shown in FIG. 2 need not be in graphical form as shown, but can be in any database form that can store the relationships of the organization, such as the one shown. The database can store the title or identity of the role, in addition to the name of the incumbent.

(Pinard, col. 2, line 62 to col. 3, line 3)

Mary has therefore also entered MY BOSS in the Allowed Callers list in the call screening feature stored in the database, which may be seen from the organization chart of FIG. 2 as identifying Fred. This means that whoever fills the role of Mary's boss (e.g. permanently or for the day) will have calls allowed through to Mary.

(Pinard, col. 3, lines 27-33)

Pinard appears to teach a database storing relationships of an organization including the title, identity, and name of incumbent. An employee can enter a role in the Allowed Callers list to define which calls will be allowed. Pinard does not appear to teach or suggest wherein the processing relationship value is configured for use in identifying an FSO business entity as an owner of the financial service organization transaction-related data, wherein the FSO business entity is a bank branch office or a regional bank or a credit card line or an issuer or an acquirer.

Concerning claim 147 and 150, the Examiner states:

As per claims 4, 27, 54, 147, and 150, Pinard discloses, wherein the FSO business entity is a company or a business unit or a bank branch office or a regional bank or a credit card line or an issuer or an acquirer. In Fig. 2 of Pinard shows a business entity as a company and a business unit (see col. 2, lin 62- col.. 3, line 3 and lines 27-32)

Applicant notes that claims 147 and 150 include different features than claim 4. For example, claim 147 recites: "wherein the plurality of lower level processing relationship objects comprises a credit card issuer object representing a credit card issuer and an acquirer object representing an acquirer, and wherein each of the credit card issuer object and the acquirer object has one or more descendent processing relationship objects." Claim 150 recites: "wherein at least one of the

one or more descendent processing relationship objects represents a bank branch.” Neither Pinard nor the other cited art appears to teach or suggest these features in combination with the other features of claims.

Claim 11 recites: “wherein the displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number for at least one of the plurality of lower level processing relationship objects and a level number for the at least one lower level processing relationship object, wherein the level number identifies a level in the processing relationship structure.” The cited art does not appear to teach or suggest this feature in combination with the other features of claim 11.

The Examiner states:

As per claims 11, 34, 61, 148, 151, Pinard discloses, wherein the displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number and a level number. (Fig. 3 – shows displayed values in a sequence number for the lower level processing objects and the name identifies level number in the processing relationship structure beginning in with the name Helen, Joe, or Fred (lower level processing objects)).

Applicant respectfully disagrees that Fig. 3 of Pinard discloses the above-quoted features of claim 11. Fig. 3 of Pinard discloses only a name column (e.g., “Bill”) and an extension # column (e.g., “1600”). Applicant submits that a name, such as “Bill”, is not a sequence number or a level number. Applicant further submits that a telephone extension # is not a sequence number or a level number. For at least these reasons, Applicant submits that Pinard does not teach or suggest displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number for at least one of the plurality of lower level processing relationship objects and a level number for the at least one lower level

processing relationship object, wherein the level number identifies a level in the processing relationship structure.

Regarding claim 151, the Examiner states:

As per claims 11, 34, 61, 148, 151, Pinard discloses, wherein the displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number and a level number. (Fig. 3 – shows displayed values in a sequence number for the lower level processing objects and the name identifies level number in the processing relationship structure beginning in with the name Helen, Joe, or Fred (lower level processing objects)).

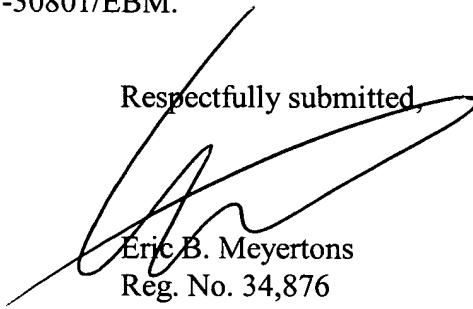
Applicant notes that claim 151 includes different features than claim 11. For example, claim 151 recites: “wherein displaying the at least two processing relationship object representations comprises displaying a row for each of at least two processing relationship objects, wherein each of the rows comprises an object identifier and a level number, wherein the descendants of each object appear directly below that object.” Neither Pinard nor the other cited art appears to teach or suggest these features in combination with the other features of claims.

Amended claim 149 recites: “wherein at least one of the one or more descendent processing relationship objects represents a credit card issuer or an acquirer.” The cited art does not appear to teach or suggest this feature in combination with the other features of claim 149.

F. **Additional Remarks**

Based on the above, Applicant submits that the claims are now in condition for allowance. Favorable reconsideration is respectfully solicited.

A fee authorization is enclosed for a two-month extension of time. If any additional extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are inadvertently omitted or if any fees are required or have been overpaid, please appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C. Deposit Account Number 50-1505/5053-30801/EBM.

Respectfully submitted,

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